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14
15 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION,**

18 **- and -**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors.**

21 Affects PG&E Corporation

22 Affects Pacific Gas and Electric Company

23 Affects both Debtors

24 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

25 Case No. 19-30088 (DM)

26 (Lead Case) (Jointly Administered)

27 **DEBTORS' RESPONSE TO THE OBJECTION
OF ADVENTIST HEALTH, AT&T, PARADISE
ENTITIES AND COMCAST TO TRUST
DOCUMENTS**

28 Date: May 15, 2020

Date: 10:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”),
2 as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11
3 cases (the “**Chapter 11 Cases**”), respectfully submit this response to the Objection [Dkt. No. 7072]
4 (the “**Objection**”) filed by the Objectants (as defined therein), pursuant to the *Stipulation by and*
5 *Among the Plan Proponents, the Official Committee of Tort Claimants, the Adventist Health*
6 *Claimants, the Paradise Related Entities, AT&T and Comcast Regarding Fire Victim Trust Document*
7 *Issues* [Dkt. No. 7050] (the “**Briefing Stipulation**”), which this Court approved in its Order dated May
8 4, 2020 [Dkt. No. 7060] (the “**Briefing Order**”).¹

9 Pursuant to the terms of the Briefing Stipulation and the Briefing Order, the Objection is limited
10 to the Trust Documents, and any other objections to the Plan are reserved for the Confirmation Hearing
11 and must be filed in accordance with the deadlines established in the Disclosure Statement Order.

12 **Debtors’ Response**

13 The Debtors’ primary objective is and has been from the outset of these Chapter 11 Cases to
14 establish a process that fairly and expeditiously compensates those who are entitled to compensation
15 from the Debtors for liabilities resulting from the tragic 2017 and 2018 Northern California wildfires.
16 *See Am. Decl. of Jason P. Wells in Support of First Day Motions* [Dkt. No. 263] (“**Wells Decl.**”) at 4.
17 This objective obviously contemplates that the Trust Documents to be implemented pursuant to the
18 Plan treat all holders of Fire Victim Claims in the same manner and fairly and equitably.

19 As is customary in mass tort chapter 11 cases, the trust documents that are implemented as part
20 of a chapter 11 plan are formulated and prepared by the statutory representatives of the beneficiaries
21 of the trust. That is the case here, with the TCC taking the lead role in that undertaking, and dealing
22 with those holders of Fire Victim Claims that have raised issues or concerns with the Trust Documents.
23 Although the Debtors understand that progress has been made in addressing certain of the concerns
24 raised by the Objectants, not all have been resolved, thereby necessitating the Objection that has been
25 filed with the Court.

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27
28 ¹ Capitalized terms used but not defined herein have the meanings given in the Briefing Stipulation.

The Debtors do not take any formal position with respect to the Objection, other than to reiterate that the Trust Documents ultimately approved as part of the Plan should ensure that all claims channeled to the Fire Victim Trust are treated fairly, similarly, and equitably despite the nature of the underlying claim and the holder thereof.

Dated: May 12, 2020

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Stephen Karotkin
Stephen Karotkin

Attorneys for Debtors and Debtors in Possession